

FILED

OCT 02 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

OCT 02 2019

MAGISTRATE JUDGE
JEFFREY I. CUMMINGS

UNITED STATES OF AMERICA

v.

CONCEPCION MALINEK

)
) No. 19 CR 277
)
) Violations: Title 18, United States
) Code, Sections 1589(a)(2), (a)(3), (a)(4)
) and 1546
)
) Superseding Indictment

JUDGE CHANG

COUNT ONE

MAGISTRATE JUDGE COLE

The SPECIAL JANUARY 2019 GRAND JURY charges:

Between in or around December 2018, and on or about March 26, 2019, in the
Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a
person, namely Victim 1, by means of: (a) serious harm and threats of serious harm
to Victim 1 or another person; (b) abuse and threatened abuse of the law and legal
process; and (c) a scheme, plan, and pattern intended to cause Victim 1 to believe
that, if Victim 1 did not perform such labor and services, Victim 1 or another person
would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and
(a)(4).

COUNT TWO

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around December 2018, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 2, by means of: (a) serious harm and threats of serious harm to Victim 2 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 2 to believe that, if Victim 2 did not perform such labor and services, Victim 2 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT THREE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around April 2018, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 3, by means of: (a) serious harm and threats of serious harm to Victim 3 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 3 to believe that, if Victim 3 did not perform such labor and services, Victim 3 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT FOUR

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around January 2019, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 4, by means of: (a) serious harm and threats of serious harm to Victim 4 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 4 to believe that, if Victim 4 did not perform such labor and services, Victim 4 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT FIVE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around April 2018, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 5, by means of: (a) serious harm and threats of serious harm to Victim 5 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 5 to believe that, if Victim 5 did not perform such labor and services, Victim 5 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT SIX

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around August 2018, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 6, by means of: (a) serious harm and threats of serious harm to Victim 6 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 6 to believe that, if Victim 6 did not perform such labor and services, Victim 6 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT SEVEN

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around December 2018, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 7, by means of: (a) serious harm and threats of serious harm to Victim 7 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 7 to believe that, if Victim 7 did not perform such labor and services, Victim 7 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT EIGHT

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around December 2018, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 8, by means of: (a) serious harm and threats of serious harm to Victim 8 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 8 to believe that, if Victim 8 did not perform such labor and services, Victim 8 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT NINE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around December 2018, and on or about March 26, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 9, by means of: (a) serious harm and threats of serious harm to Victim 9 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 9 to believe that, if Victim 9 did not perform such labor and services, Victim 9 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT TEN

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Between in or around October 2009, and in or around August 2014, in the Northern District of Illinois, Eastern Division, and elsewhere,

CONCEPCION MALINEK,

defendant herein, did knowingly provide and obtain the labor and services of a person, namely Victim 10, by means of: (a) serious harm and threats of serious harm to Victim 10 or another person; (b) abuse and threatened abuse of the law and legal process; and (c) a scheme, plan, and pattern intended to cause Victim 10 to believe that, if Victim 10 did not perform such labor and services, Victim 10 or another person would suffer serious harm;

In violation of Title 18, United States Code, Sections 1589(a)(2), (a)(3) and (a)(4).

COUNT ELEVEN

The SPECIAL JANUARY 2019 GRAND JURY further charges:

In or around February 2019, in the Northern District of Illinois, Eastern Division,

CONCEPCION MALINEK,

defendant herein, did knowingly possess, obtain, accept, and receive a permanent resident card and social security card in the name of Victim 1 as evidence of authorized stay or employment in the United States, which the defendant knew to be forged, counterfeited, falsely made, and unlawfully obtained;

In violation of Title 18, United States Code, Section 1546(a).

COUNT TWELVE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

In or around December 2018, in the Northern District of Illinois, Eastern Division,

CONCEPCION MALINEK,

defendant herein, did knowingly possess, obtain, accept, and receive a permanent resident card and social security card in the name of Victim 2 as evidence of authorized stay or employment in the United States, which the defendant knew to be forged, counterfeited, falsely made, and unlawfully obtained;

In violation of Title 18, United States Code, Section 1546(a).

COUNT THIRTEEN

The SPECIAL JANUARY 2019 GRAND JURY further charges:

In or around February 2019, in the Northern District of Illinois, Eastern Division,

CONCEPCION MALINEK,

defendant herein, did knowingly possess, obtain, accept, and receive a permanent resident card and social security card in the name of Victim 4 as evidence of authorized stay or employment in the United States, which the defendant knew to be forged, counterfeited, falsely made, and unlawfully obtained;

In violation of Title 18, United States Code, Section 1546(a).

COUNT FOURTEEN

The SPECIAL JANUARY 2019 GRAND JURY further charges:

In or around January 2019, in the Northern District of Illinois, Eastern Division,

CONCEPCION MALINEK,

defendant herein, did knowingly possess, obtain, accept, and receive a permanent resident card and social security card in the name of Victim 7 as evidence of authorized stay or employment in the United States, which the defendant knew to be forged, counterfeited, falsely made, and unlawfully obtained;

In violation of Title 18, United States Code, Section 1546(a).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1589, as alleged in Counts One through Ten of the foregoing Superseding Indictment,

CONCEPCION MALINEK,

defendant herein, shall forfeit to the United States of America any property which constitutes and is derived from proceeds defendant obtained as a result of such offense, property involved in, used and intended to be used to commit and to facilitate the commission of such offense, and property traceable to such property, as provided by Title 18, United States Code, Sections 1594(d)(1) and (d)(2).

2. The property to be forfeited includes but is not limited to United States currency seized from the defendant's residence on or about March 26, 2019, in the approximate amount of \$3,549.

3. If any of the property described above, as a result of any act or omission by the defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY